

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Midland Funding LLC,	)	CASE NO.: 3:08-cv-01434
	)	
Plaintiff,	)	JUDGE: Katz
	)	
vs.	)	
	)	
Andrea Brent,	)	
	)	
Defendant,	)	
	)	
vs.	)	
	)	
Midland Credit Management, Inc.	)	
	)	
Third-Party Defendant	)	
	)	

**Joint Motion for an Extension of Time  
to Brief the Issue of Class Certification**

Now comes Defendant, Andrea Brent, Plaintiff Midland Funding LLC (“Midland”), and Third-Party Defendant Midland Credit Management, Inc. (“MCM”), by and through undersigned counsel, and request that this Court stay the Parties’ obligations to brief the issue of class action certification until after the Court rules upon the parties’ dispositive motions, now due to be filed on October 21, 2008.

Local Rule 23.1(c) requires that “the party or parties asserting a class action shall, within (90) days after the filing of a pleading asserting the existence of a class or within such other period of time mandated by controlling statute, move for a determination under Fed.R.Civ.P. 23(c)(1), whether the action is to be maintained and, if so, the membership of the rule.” To that end, Defendant has filed a Motion for Class Certification on August 19, 2008 – yet did not file a brief in support.

It is the parties' understanding that the issue of class certification is to be stayed until after the issue of liability is determined. The parties therefore request that this Court grant them an extension of time to brief the issue of class certification, until the court renders an opinion on liability, and orders a briefing schedule on the subject.

Respectfully Submitted,

/s/ R. Glenn Knirsch

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